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Counsel for Emilio Jose Heredia Collado

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

EMILIO JOSE HEREDIA COLLADO,

Defendant.

Case No. 21-cr-00109-CRB

**PARTIES' STIPULATION AND
PROPOSED ORDER FOR
MODIFICATION OF PROBATION
CONDITIONS TO PERMIT TRAVEL TO
EASTERN DISTRICT OF CALIFORNIA**

Whereas, Defendant Emilio Heredia was sentenced on August 10, 2023,
to a term of probation without incarceration:

Whereas, Mr. Heredia has complied with all of the conditions of probation
since that time;

Whereas, one condition of probation requires that Mr. Heredia obtain
permission from his probation officer before traveling outside the District of
Northern California;

Whereas, Mr. Heredia routinely travels to the Eastern District of California;
and

Whereas, the parties and probation consider the requirement that Mr.

Heredia obtain permission before each trip outside the Northern District of California to be unnecessary and unduly burdensome;

It is hereby stipulated by and among the parties through their respective attorneys of record that the Conditions of Probation should be modified to permit Mr. Heredia to travel to the Eastern District of California without advance notice to or permission from his Probation Officer.

This stipulation has been approved by U.S. Probation Officer Leon Dang.

Dated: June 11, 2025

/s/ Ted W. Cassman
Ted W. Cassman
Counsel for Emilio Heredia

Dated: June 11, 2025

/s/ Matthew F. Sullivan
Matthew F. Sullivan
Trial Attorney
Criminal Division
U.S. Department of Justice

PROPOSED ORDER

Pursuant to the parties' stipulation and good cause appearing, it is hereby ORDERED that defendant's Conditions of Probation are modified to permit Mr. Heredia to travel to the Eastern District of California without advance notice to or permission from his Probation Officer.

Dated: June __, 2025

Hon. Charles R. Breyer
U.S. District Court Judge